

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	No.: 4:13-CR-00077 HEA-DDN
)	
v.)	
)	
JACOB OLSON,)	
)	
Defendant,)	

**DEFENDANT JACOB OLSON’S OBJECTION TO THE REPORT
AND RECOMMENDATION RELATING TO DEFENDANT’S
MOTION TO SUPPRESS**

Comes now Defendant by counsel Mark R. Bahn and pursuant to Federal Rule of Criminal Procedure 59 herewith submits his objections to the Report and Recommendation of the Honorable David Noce dated June 13, 2013 overruling Defendant's Motion to Suppress Evidence seized pursuant to a traffic stop and subsequent search warrant and for his objections states as follows:

1. That on March 26, 2013, Defendant filed herein his Motion to Suppress Evidence.
2. The Motion was called on for hearing on May 2, 2013 before the Honorable David Noce. At that time the motion was submitted on the record which consisted of the applicable trial transcript from the

criminal charges filed in state court; exhibits of the three search warrants in question and briefs that were subsequently submitted by both parties.

3. On June 13, 2013 Judge Noce submitted his recommendation to this Court to overrule Defendant's motion and set the date of July 2, 2013 by which Defendant should file his Objections.

4. Defendant objects to the recommendation of Judge Noce and submits to this Court that the evidence that was seized in the initial traffic stop and at the execution of subsequent search warrants was improperly obtained and should be suppressed and excluded from evidence for the reasons more specifically set out in Defendant's Motion and Memorandum of Law.

WHEREFORE, for the foregoing reasons, Defendant Jacob Olson files his Objection to the Report and Recommendation of Judge Noce to overrule his Motion to Suppress and moves this Court to review and reconsider the recommendation, and for such further and other relief that this Court may deem meet and just.

Respectfully submitted,

McAVOY AND BAHN, L.C.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was served this 28th day of June, 2013, electronically filing with the clerk of the court by using CM/ECF system, which sent notification of such filing to the following parties:

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